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May 9, 2019

VIA ECF

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York
Institute of Technology, et al.*, 14-CV-04020 (AKT)

Dear Judge Tomlinson:

This firm represents Defendant New York Institute of Technology (“NYIT”), improperly named herein as New York College of Osteopathic Medicine of New York Institute of Technology, in the above-referenced action. I write on behalf of Plaintiff Ajay Bahl and NYIT to respectfully request an adjournment of the deadline to submit a proposed joint expert discovery schedule from May 9, 2019 until May 24, 2019. This is the same deadline that was broached by Your Honor during the April 25, 2019 status conference for NYIT to submit a one-page letter setting forth its proposed basis for summary judgment and the parties’ proposed summary judgment briefing schedule.

Although counsel for the parties have conferred concerning any remaining expert discovery to be conducted in this action, Plaintiff’s counsel were not involved with the initial expert discovery that was conducted on this case. As such, counsel for the parties require additional time to further assess the need for any expert discovery and to set a proposed schedule based on the availability of any designated experts.

Thank you for Your Honor’s consideration of the parties’ request.

CLIFTON BUDD & DEMARIA, LLP


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Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP
*Attorneys for New York Institute of
Technology*

By: 
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Stefanie R. Toren
Stephen P. Pischl

cc: **VIA ECF**
Jason H. Ehrenberg, Esq.
Peter K. Tompa, Esq.